

**Freedom Court Reporting, Inc**

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE EASTERN DISTRICT OF TEXAS  
3                   MARSHALL DIVISION

4       PATTY BEALL, MATTHEW  
5       MAXWELL, TALINA MCELHANY  
6       and KELLY HAMPTON,  
7       individually, and on  
8       behalf of all others  
9       similarly situated,

10                   Plaintiffs,

11       vs.

CASE NO: 2:08-cv-422 TJW

12       TYLER TECHNOLOGIES, INC.,  
13       and EDP ENTERPRISES, INC.,

14                   Defendants.

15                   \* \* \* \* \*

16       DEPOSITION OF:     RONALD GRIMWOOD

17       DATE TAKEN:        September 8, 2010

18       TIME:               2:05 p.m. - 4:10 p.m.

19       PLACE:             ComCenter Bradenton  
20                           6150 State Road 70 E  
21                           Bradenton, Florida 34203

22       TAKEN BY:          The Defendants

23       REPORTED BY:       Kerry Mercade, CSR, CRI, FPR  
24                           Court Reporter and Notary Public  
25

**367 Valley Avenue Birmingham, Alabama (877) 373-3660**

**EXHIBIT NO. 39**

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## 14 S T I P U L A T I O N S

15 It is hereby agreed and so stipulated by and  
 16 between the parties hereto, through their  
 17 respective counsel, that the reading and signing  
 18 of the transcript are expressly reserved by the  
 19 Deponent.

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1 current processes?

2 A. Yes.

3 Q. And is that again a role that was  
4 performed by the project manager?

5 A. The project manager may get involved in  
6 that or the implementation team may get involved  
7 in that, depending on the site. There is a  
8 difference between big sites and small sites.

9 Q. And I take it, it would be more likely  
10 that the project manager would be involved in that  
11 process if it was a larger site?

12 A. A larger site, yes, would be involved with  
13 someone else in that to get into the nitty gritty  
14 detail.

15 Q. And is there a shorthand way to refer to  
16 this? I don't know if it's a meeting or process  
17 by which Tyler generally assigns duties and  
18 responsibilities and learns how the customer  
19 handles requisitions and other processes?

20 A. Usually, the implementation specialist,  
21 who was responsible for those programs, would meet  
22 with whomever the site decided they should meet  
23 with to get the answers to those questions.

24 Q. So this was something that you, as an  
25 implementation specialist, performed? This was a

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1     role?

2           A.     Yes.

3           Q.     My question, though -- is there some  
4     shorthand reference to call it?  Initial meeting?  
5     I don't know.

6           A.     I'm trying to think of -- there is, I  
7     can't remember out of the top of my head what they  
8     could call it.

9           Q.     Not systems analysis?

10          A.     No.  It's like something that I never  
11     could understand how they came up with the terms.  
12     It was basically, like I said, was to determine:  
13     What are you doing now?  How are you doing it?

14          Q.     Now, prior to performing this function  
15     of -- well, let me make sure I understand  
16     correctly.  This was an exchange of information  
17     that occurred in a face-to-face meeting,  
18     typically?

19          A.     Yes.  It occurred in meetings, yes.

20          Q.     So by this phase of the implementation,  
21     you, as the implementation specialist, would have  
22     been dispatched to the customer location?

23          A.     Yes.

24          Q.     Would you, as an implementation  
25     specialist, have done any preparatory work prior

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1 to this meeting?

2 A. Print out the questions.

3 Q. Would you have reviewed the project plan,  
4 typically?

5 A. Typically, yes.

6 Q. And when you say "print out the  
7 questions," what questions do you mean?

8 A. There was a prepared list based on the  
9 program, you know, purchasing, fixed assets, what  
10 have you. There is a prepared list of questions  
11 that needed to be asked to determine specifically  
12 how they were doing things and what their policies  
13 were. We would go by that list to make sure we  
14 covered every single thing.

15 Q. How long are the lists? What kind of  
16 document are we talking about?

17 A. Could be -- again, most of them were  
18 pretty well the same. I mean, we wouldn't  
19 necessarily ask a small site certain questions,  
20 because we knew that they wouldn't do those  
21 things. But I would say, you know, three to four  
22 pages of questions. And, again, it would depend  
23 on the module, the program. You know, fixed  
24 assets wouldn't have as many questions as accounts  
25 payable, or purchasing, or anything like that.

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1 Q. And how long would these -- would this  
2 meeting typically take?

3 A. Again, it would depend on the site. You  
4 know, it could take a day or it could take two or  
5 three days depending on, again, how many people  
6 were involved, how detailed the program was.

7 Q. And when you say how many people were  
8 involved, you mean how many people were involved  
9 in the meetings?

10 A. Yes. The site would determine who they  
11 wanted to have there.

12 Q. And would you prepare any documentation,  
13 as an implementation specialist, from these  
14 meetings?

15 A. From the meetings?

16 Q. Yes. As a --

17 A. The answers to all those questions.

18 Q. And what form would you record those  
19 answers?

20 A. It's a Word document, using the questions  
21 as the key and putting down all of the answers  
22 that we got, and the policies, and make reference  
23 to whatever their policies were.

24 Q. Give me an example of a policy. What kind  
25 of questions were you asking during this initial

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1 stage?

2 A. Requisitions is an example, okay. Who  
3 creates the first requisition? Where is the  
4 requisition first created? Is it created at the  
5 janitor level? Is it created at the purchasing  
6 office? Where is it actually created? If it is  
7 created down here someplace in the organization,  
8 how does it proceed to get to purchasing to become  
9 a purchase order? What is the policy? Who can do  
10 it? What can they buy?

11 All of those kinds of questions would be  
12 asked during that process. They would be listed  
13 there when we would get their policy. Do you have  
14 credit cards? If so, who has access to the credit  
15 card? What is the amount they can purchase? You  
16 know, what is your policy on this? Do you have a  
17 policy manual? Can we get your policy manual?  
18 Those kinds of things.

19 Q. Is it your testimony that all of those  
20 questions would have been in the list that you  
21 would have printed out?

22 A. Yes.

23 Q. What is the next step of the  
24 implementation process?

25 A. The next step after that would be to sit

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